

UNITED STATES DISTRICT COURT

for the

Eastern District of California



FEDERAL Division

Cassandra Bonita Charles

Plaintiff(s)

(Write the full name of each plaintiff who is filing this complaint. If the names of all the plaintiffs cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

-v-

SEE LIST OF NAMES

Defendant(s)


(Write the full name of each defendant who is being sued. If the names of all the defendants cannot fit in the space above, please write "see attached" in the space and attach an additional page with the full list of names.)

Case No.

2:23-cv-12100 DAD AC (PS)
(to be filled in by the Clerk's Office)Jury Trial: (check one) ☒ Yes ☐ No

FILED

OCT 04 2023

CLERK, U.S. DISTRICT COURT
EASTERN DISTRICT OF CALIFORNIA
BY  DEPUTY CLERK

COMPLAINT FOR A CIVIL CASE

I. The Parties to This Complaint

A. The Plaintiff(s)

Provide the information below for each plaintiff named in the complaint. Attach additional pages if needed.

Name	Cassandra B. Charles
Street Address	2300 K Street. #403
City and County	Sacramento
State and Zip Code	CA 95816
Telephone Number	916-398-6619
E-mail Address	ccbbcharles53@gmail.com

B. The Defendant(s)

Provide the information below for each defendant named in the complaint, whether the defendant is an individual, a government agency, an organization, or a corporation. For an individual defendant, include the person's job or title (if known). Attach additional pages if needed.

Defendant No. 1

Name	U.S. Office of Personnel Management
Job or Title <i>(if known)</i>	Unknown
Street Address	1900 E Street NW
City and County	Washington
State and Zip Code	D.C. 20005
Telephone Number	202-606-1800
E-mail Address <i>(if known)</i>	Unknown

Defendant No. 2

Name	Pension Benefits Guaranty Corporation
Job or Title <i>(if known)</i>	Unknown
Street Address	P.O. Box 151750
City and County	Alexndria Fairfax
State and Zip Code	Virginia 22315
Telephone Number	800-763-2444
E-mail Address <i>(if known)</i>	Unknown

Defendant No. 3

Name	Accenture Federal Services
Job or Title <i>(if known)</i>	Unknown
Street Address	1201 New York Ave.. NW
City and County	Washington
State and Zip Code	D.C. 20005
Telephone Number	877-889-9009
E-mail Address <i>(if known)</i>	Unknown

Defendant No. 4

Name	Federal Retirement Thrift Investment
Job or Title <i>(if known)</i>	Unknown
Street Address	77 K Street, NE Ste. 1000
City and County	Washington
State and Zip Code	D.C. 20002
Telephone Number	202-942-1600
E-mail Address <i>(if known)</i>	Unknown

Defendant No. 1

Name	Alight Solutions
Job or Title <i>(if known)</i>	Unknown
Street Address	4 Overlook Point 40P
City and County	Lincolnshire
State and Zip Code	Illinois 60009
Telephone Number	224-737-7000
E-mail Address <i>(if known)</i>	Unknown

Defendant No. 2

Name	Office of the Air Force Inspector General
Job or Title <i>(if known)</i>	Unknown
Street Address	1140 AF Pentagon
City and County	Washington
State and Zip Code	D.C. 20330
Telephone Number	202-404-5334
E-mail Address <i>(if known)</i>	Unknown

Defendant No. 3

Name	U.S. Office of the Inspector General
Job or Title <i>(if known)</i>	Unknown
Street Address	950 Pennsylvania Ave. NW
City and County	Washington
State and Zip Code	D.C. 20530
Telephone Number	202-514-3435
E-mail Address <i>(if known)</i>	Unknown

Defendant No. 4

Name	Defense Finance Accounting Services
Job or Title <i>(if known)</i>	Unknown
Street Address	8899 East 56th Street
City and County	Indiapolis Marion
State and Zip Code	Indiana 46249
Telephone Number	888-332-7411
E-mail Address <i>(if known)</i>	Unknown

Defendant No. 1

Name	Employee Benefits Administration, Dept. of Labor
Job or Title <i>(if known)</i>	Unknown
Street Address	8899 East-West Hwy
City and County	Silversprings Montgomery
State and Zip Code	Maryland 20910
Telephone Number	202-693-8700
E-mail Address <i>(if known)</i>	Unknown

Defendant No. 2

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 3

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

Defendant No. 4

Name	
Job or Title <i>(if known)</i>	
Street Address	
City and County	
State and Zip Code	
Telephone Number	
E-mail Address <i>(if known)</i>	

II. Basis for Jurisdiction

Federal courts are courts of limited jurisdiction (limited power). Generally, only two types of cases can be heard in federal court: cases involving a federal question and cases involving diversity of citizenship of the parties. Under 28 U.S.C. § 1331, a case arising under the United States Constitution or federal laws or treaties is a federal question case. Under 28 U.S.C. § 1332, a case in which a citizen of one State sues a citizen of another State or nation and the amount at stake is more than \$75,000 is a diversity of citizenship case. In a diversity of citizenship case, no defendant may be a citizen of the same State as any plaintiff.

What is the basis for federal court jurisdiction? *(check all that apply)*

☒ Federal question

☒ Diversity of citizenship

Fill out the paragraphs in this section that apply to this case.

A. If the Basis for Jurisdiction Is a Federal Question

List the specific federal statutes, federal treaties, and/or provisions of the United States Constitution that are at issue in this case.

28 U.S.C. 1331

The ERISA Act of 1974

The U.S. Constitution, Article 1,8 Management of Funds in Direct Benefits Plan

B. If the Basis for Jurisdiction Is Diversity of Citizenship**1. The Plaintiff(s)****a. If the plaintiff is an individual**

The plaintiff, *(name)* Cassandra B. Charles, is a citizen of the State of *(name)* California.

b. If the plaintiff is a corporation

The plaintiff, *(name)* _____, is incorporated under the laws of the State of *(name)* _____, and has its principal place of business in the State of *(name)* _____.

(If more than one plaintiff is named in the complaint, attach an additional page providing the same information for each additional plaintiff.)

2. The Defendant(s)**a. If the defendant is an individual**

The defendant, *(name)* _____, is a citizen of the State of *(name)* _____. Or is a citizen of *(foreign nation)* _____.

b. If the defendant is a corporation

The defendant, (name) U.S. Office of Personnel Management, is incorporated under the laws of the State of (name) Washington D.C., and has its principal place of business in the State of (name) Washington D.C..
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):
Full value of retirement annuity established in December 1979 to be paid out monthly per contract.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I contributed \$100.00 monthly into an annuity retirement account through the Department of the Air Force.
I am being denied retirement monies.
I am being denied access to my annuity retirement account.
I am being denied annuity account information.
I am being denied access to my generated 1099Rs.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Injunctive claim relief to pay out my annuity retirement account per contract.
Compensatory hardship claim relief to be determined by a jury.
Compensatory emotional stress claim relief to be determined by a jury.
Punitive claim relief to be determined by a jury.

b. If the defendant is a corporation

The defendant, (name) Pension Benefits Guaranty Corporation, is incorporated under the laws of the State of (name) Virginia, and has its principal place of business in the State of (name) Virginia.
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) United States.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because (explain):

Full value monthly value of retirement monies owed to me in the form of a retirement annuity account established in December 1979.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I contributed monies into an annuity retirement account through the Department of the Air Force.

I am/was never notified concern my retirement annuity account.

Denied retirement monies.

Denied account information.

Denied access to retirement account.

Denied access to 1099-Rs

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Injunctive claim relief to pay our my retirement annuity account per contract.

Compensatory hardship claim relief to be determined by a jury.

Compensatory emotional steess claim relief to be determined by a jury.

Punitive claim relief to be determined by a jury.

b. If the defendant is a corporation

The defendant, (name) Accenture Federal Services, is incorporated under the laws of the State of (name) Washington D.C., and has its principal place of business in the State of (name) Washington D.C..
Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:
Full value of retirement annuity established in December 1979 to be paid out monthly per contract.

III. Statement of Claim

Write a short and plain statement of the claim. Do not make legal arguments. State as briefly as possible the facts showing that each plaintiff is entitled to the damages or other relief sought. State how each defendant was involved and what each defendant did that caused the plaintiff harm or violated the plaintiff's rights, including the dates and places of that involvement or conduct. If more than one claim is asserted, number each claim and write a short and plain statement of each claim in a separate paragraph. Attach additional pages if needed.

I contributed \$100.00 monthly into an annuity retirement account through the Department of the Air Force.
I am being denied retirement monies.
I am being denied access to my annuity retirement account.
I am being denied annuity account information.
I am being denied access to my generated 1099Rs.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Injunctive claim relief to pay out my annuity retirement account per contract.
Compensatory hardship claim relief to be determined by a jury.
Compensatory emotional stress claim relief to be determined by a jury.
Punitive claim relief to be determined by a jury.

b. If the defendant is a corporation

The defendant, (name) Federal Retirement Thrift Investment, is incorporated under the laws of the State of (name) Washington D.C., and has its principal place of business in the State of (name) Washington D.C..
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

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I am being denied retirement monies.
I am being denied access to my annuity retirement account.
I am being denied annuity account information.
I am being denied access to my generated 1099Rs.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Injunctive claim relief to pay out my annuity retirement account per contract.
Compensatory hardship claim relief to be determined by a jury.
Compensatory emotional stress claim relief to be determined by a jury.
Punitive claim relief to be determined by a jury.

b. If the defendant is a corporation

The defendant, (name) Alight Solutions, is incorporated under the laws of the State of (name) Illinois, and has its principal place of business in the State of (name) Illinois.
 Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

The amount in controversy—the amount the plaintiff claims the defendant owes or the amount at stake—is more than \$75,000, not counting interest and costs of court, because *(explain)*:

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 I am being denied retirement monies.
 I am being denied access to my annuity retirement account.
 I am being denied annuity account information.
 I am being denied access to my generated 1099Rs.

IV. Relief

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Injunctive claim relief to pay out my annuity retirement account per contract.
 Compensatory hardship claim relief to be determined by a jury.
 Compensatory emotional stress claim relief to be determined by a jury.
 Punitive claim relief to be determined by a jury.

b. If the defendant is a corporation

The defendant, (name) Defense Finance Accounting Services, is incorporated under the laws of the State of (name) Indiana, and has its principal place of business in the State of (name) Indiana.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

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IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Injunctive claim relief to pay out my annuity retirement account per contract.
Compensatory hardship claim relief to be determined by a jury.
Compensatory emotional stress claim relief to be determined by a jury.
Punitive claim relief to be determined by a jury.

b. If the defendant is a corporation

The defendant, (name) Office of the Air Force Inspector General, is incorporated under the laws of the State of (name) Washington D.C., and has its principal place of business in the State of (name) Washington D.C..
Or is incorporated under the laws of (foreign nation) _____,
and has its principal place of business in (name) _____.

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I am being denied retirement monies.
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IV. Relief

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Injunctive claim relief to pay out my annuity retirement account per contract.
Compensatory hardship claim relief to be determined by a jury.
Compensatory emotional stress claim relief to be determined by a jury.
Punitive claim relief to be determined by a jury.

b. If the defendant is a corporation

The defendant, (name) U.S. Office of the Inspector General, is incorporated under the laws of the State of (name) Washington D.C., and has its principal place of business in the State of (name) Washington D.C..

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

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Injunctive claim relief to pay out my annuity retirement account per contract.
Compensatory hardship claim relief to be determined by a jury.
Compensatory emotional stress claim relief to be determined by a jury.
Punitive claim relief to be determined by a jury.

b. If the defendant is a corporation

The defendant, (name) Employee Benefits Administration, Dept., is incorporated under the laws of the State of (name) Maryland, and has its

principal place of business in the State of (name) Maryland.

Or is incorporated under the laws of (foreign nation) _____, and has its principal place of business in (name) _____.

(If more than one defendant is named in the complaint, attach an additional page providing the same information for each additional defendant.)

3. The Amount in Controversy

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I am being denied retirement monies.

I am being denied access to my annuity retirement account.

I am being denied annuity account information.

I am being denied access to my generated 1099Rs.

IV. Relief

State briefly and precisely what damages or other relief the plaintiff asks the court to order. Do not make legal arguments. Include any basis for claiming that the wrongs alleged are continuing at the present time. Include the amounts of any actual damages claimed for the acts alleged and the basis for these amounts. Include any punitive or exemplary damages claimed, the amounts, and the reasons you claim you are entitled to actual or punitive money damages.

Injunctive claim relief to pay out my annuity retirement account per contract.

Compensatory hardship claim relief to be determined by a jury.

Compensatory emotional stress claim relief to be determined by a jury.

Punitive claim relief to be determined by a jury.

Full amount of retirement anuity as calculated per promise
Injunctive Claim for Relief to be determined by jury
Compensatory Claim for Relief to be determined by jury
Punitive Claim for Relief to be determined by jury
Prayer for Relief

V. Certification and Closing

Under Federal Rule of Civil Procedure 11, by signing below, I certify to the best of my knowledge, information, and belief that this complaint: (1) is not being presented for an improper purpose, such as to harass, cause unnecessary delay, or needlessly increase the cost of litigation; (2) is supported by existing law or by a nonfrivolous argument for extending, modifying, or reversing existing law; (3) the factual contentions have evidentiary support or, if specifically so identified, will likely have evidentiary support after a reasonable opportunity for further investigation or discovery; and (4) the complaint otherwise complies with the requirements of Rule 11.

A. For Parties Without an Attorney

I agree to provide the Clerk's Office with any changes to my address where case-related papers may be served. I understand that my failure to keep a current address on file with the Clerk's Office may result in the dismissal of my case.

Date of signing: 08/03/2023

Signature of Plaintiff

Printed Name of Plaintiff


Cassandra Bonita Charles

B. For Attorneys

Date of signing: _____

Signature of Attorney

Printed Name of Attorney

Bar Number

Name of Law Firm

Street Address

State and Zip Code

Telephone Number

E-mail Address